

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

ERIN WILSON, individually and on behalf of
others similarly situated,

Plaintiff,

v.

COOKUNITY LLC,

Defendant.

Case No. 1:25-cv-03237-TRJ

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSIONS OF TIME
TO FILE REPLIES IN SUPPORT OF MOTIONS**

COMES NOW Defendant CookUnity Inc. (incorrectly identified herein as CookUnity LLC) (“CookUnity”), by and through its undersigned counsel, and respectfully moves this Court to extend the time to file its replies in further support of its pending Motion to Compel Arbitration and Motion to Dismiss, stating as follows:

1. On August 22, 2025, Defendant filed its two pending motions: (1) Motion to Compel Arbitration (ECF No. 14), and (2) Motion to Dismiss (ECF No. 15).
2. Plaintiff filed her Opposition to the Motion to Compel Arbitration on September 11, 2025 (ECF No. 17), and her Opposition to the Motion to Dismiss on September 13, 2025 (ECF No. 19).
3. As per Local Civil Rule 7.1(C), Defendant is required to file its reply briefs within 14 days after service of the Opposition. Therefore, Defendant’s current deadline to file the reply brief in support of the Motion to Compel Arbitration is September 25, 2025. Defendant’s current deadline to file the reply brief in support of the Motion to Dismiss is September 29, 2025.

4. Defendant respectfully requests that the Court extend its deadline to file each reply brief by two weeks, so that the reply for the Motion to Compel is due October 9, 2025, and the reply to the Motion to Dismiss is due October 13, 2025.

5. The requested extensions of time will not unduly delay the progress of this action.

6. This is Defendant's first motion for an extension of time to file its reply briefs, it is made in good faith, and no party will be prejudiced by the relief sought herein.

7. The undersigned counsel has conferred with counsel for Plaintiff, who does not oppose this motion.

WHEREFORE, Defendant CookUnity respectfully requests that this Court enter an order providing it until October 9, 2025, to file its reply brief in further support of its Motion to Compel Arbitration, and until October 13, 2025, to file its reply brief in further support of its Motion to Dismiss.

Dated: September 16, 2025

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

s/ Francis X. Nolan, IV

Francis X. Nolan, IV (*pro hac vice*)

1114 Avenue of the Americas

The Grace Building 40th Floor

New York, New York 10036

Telephone: (212) 389-5000

Facsimile: (212) 389-5099

franknolan@eversheds-sutherland.com

Ian N. Jones (Bar No. 437690)

999 Peachtree Street, NE, Suite 2300

Atlanta, Georgia 30309

Telephone: (404) 853-8051

Facsimile: (404) 853-8806

ianjones@eversheds-sutherland.com

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Unopposed Motion for Extension of Time to File Replies in Support of Motions has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record, on this 16th day of September, 2025.

s/ Francis X. Nolan, IV

Francis X. Nolan, IV (*pro hac vice*)